

GREENBERG TRAURIG, LLP
MARK D. KEMPLE, ESQ.
Admitted Pro Hac Vice
1840 Century Park East, Suite 1900
Los Angeles, CA 90067
Telephone: (310) 586-7700
Facsimile: (310) 586-7800
Email: kemplem@gtlaw.com

TYLER R. ANDREWS, ESQ.
Nevada Bar No. 9499
JASON K. HICKS, ESQ.
Nevada Bar No. 13149
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: andrewst@gtlaw.com
hicksja@gtlaw.com

*Attorneys for Global Merchant Advisors, LLC
f/k/a Paysafe Services (US) LLC*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

INTERNATIONAL PAYMENT ADVISORS
LTD, a Nevada limited liability company,

Plaintiff,

v.

PAYSAFE SERVICES (US) LLC, a Delaware
Corporation; and DOES 1-10 inclusive,

Defendants.

GLOBAL MERCHANT ADVISORS, LLC,
f/k/a PAYSAFE SERVICES (US) LLC, a
Delaware limited liability company,

Counterclaimant,

v.

INTERNATIONAL PAYMENT ADVISORS
LTD, a Nevada limited liability company;
MARC MAXWELL, an individual; DOES I
through X; and ROE entities I through X,

Counter-defendants.

Case No.: 2:19-cv-203-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO HOLD RULE 26
CONFERENCE AND TO SUBMIT
STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER**

(First Request)

1 Plaintiff/Counter-defendants International Payment Advisors LTD and Marc Maxwell, by and
2 through their counsel of record, Kravitz, Schnitzer & Johnson, Chtd., and Glaser Weil Fink Howard
3 Avchen & Shapiro LLP, and Defendant/Counterclaimant Global Merchant Advisors, LLC, f/k/a
4 Paysafe Services (US) LLC, by and through its counsel of record, the law firm of Greenberg Traurig,
5 LLP, hereby stipulate and request that the Court enter an order briefly extending the time for the
6 parties to hold the FRCP 26(f) conference from May 30, 2019 to June 4, 2019, with the parties'
7 discovery plan and scheduling order being due on June 18, 2019, to permit
8 Defendant/Counterclaimant to review Plaintiff/Counter-defendants' response to the counterclaims
9 (due May 30, 2019) prior to the June 4, 2019, Rule 26 conference.

10 This stipulation is made and based upon the following:

- 11 1. Plaintiff/Counter-defendants filed the original complaint in this matter on February 1,
12 2019. ECF No. 1;
- 13 2. Defendant/Counterclaimant filed its answer and counterclaims on April 29, 2019.
14 ECF No. 28;
- 15 3. Per the parties' stipulation, Plaintiff/Counter-defendants have up to, and including,
16 May 30, 2019 to respond;
- 17 4. The last day for the parties to hold the Rule 26 conference is May 30, 2019 – 30 days
18 after the first answer by a defendant;
- 19 5. Defendant/Counterclaimant seeks to conduct the conference with the benefit of having
20 had an opportunity to first review Plaintiff/Counter-defendants' response to the counterclaims (due
21 May 30, 2019), and thereby make the conference as efficient as possible;
- 22 6. In light of the foregoing, the parties stipulate and agree to extend the time to hold the
23 Rule 26 conference up to, and including, June 4, 2019, and stipulate and agree that the proposed
24 discovery plan and scheduling order shall be filed fourteen days after the Rule 26 conference, i.e.,
25 June 18, 2019.

26 ///

27 ///

28 ///

7. This is the first request for the relief sought herein, and it is requested in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 14th day of May 2019.

DATED this 14th day of May 2019.

**KRAVITZ, SCHNITZER & JOHNSON, GREENBERG TRAUIG, LLP
CHTD.**

/s/ Adam Wax

MARTIN J. KRAVITZ, ESQ.

Nevada Bar No. 83

ADAM J. WAX, ESQ.

Nevada Bar No. 12126

8985 S. Eastern Avenue, Suite 200

Las Vegas, Nevada 89123

**GLASER WEIL FINK HOWARD
AVCHEN & SHAPIRO LLP**

PATRICIA L. GLASER, ESQ.

Admitted Pro Hac Vice

SEAN RILEY, ESQ.

Admitted Pro Hac Vice

MICHAEL GERST, ESQ.

Admitted Pro Hac Vice

10250 Constellation Blvd., 19th Floor

Los Angeles, CA 90404

Attorneys for Plaintiff/Counter-defendants

/s/ Jason Hicks

MARK D. KEMPLE, ESQ.

Admitted Pro Hac Vice

TYLER R. ANDREWS, ESQ.

Nevada Bar No. 9499

JASON K. HICKS, ESQ.

Nevada Bar No. 13149

10845 Griffith Peak Drive, Suite 600

Las Vegas, Nevada 89135

Attorneys for Defendant/Counterclaimant

ORDER

In consideration of the parties' stipulation, and with good cause appearing, IT IS HEREBY ORDERED that the parties shall hold the Rule 26(f) conference by June 4, 2019.

IT IS FURTHER ORDERED that the stipulated proposed discovery plan and scheduling order is due by June 18, 2019.

DATED this 14th day of May, 2019.


UNITED STATES MAGISTRATE JUDGE